

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

ANTHONY TRUPIA,

Plaintiff,

v.

HERITAGE HARD ASSETS LLC et al.

Defendants.

Case No. CIV-24-498-SLP

**DEFENDANT TELNYX, LLC'S MOTION
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND**

Defendant, Telnyx LLC ("Telnyx"), respectfully requests a twenty one (21) day extension of time, until and including June 17, 2024, within which to answer or otherwise respond to Plaintiff's Complaint. In support hereof, Defendant states as follows:

1. Currently, Defendant's answer or other response to Plaintiff's Complaint is due on May 27, 2024, under Federal Rule of Civil Procedure 81(c)(2)(c).
2. No prior request for an extension of time has been made.
3. Legal counsel has just been retained, and additional time is needed for counsel to consult with Telnyx and appropriately respond to Plaintiff's Complaint.
4. No scheduling order has been entered. Accordingly, no deadlines will be impacted by the granting of this motion.

WHEREFORE, Defendant, Telnyx LLC, respectfully requests a twenty one (21) day extension of time, until and including June 17, 2024, within which to answer or otherwise respond to Plaintiff's Complaint. A proposed Order is submitted herewith.

Dated: May 23, 2024

Respectfully submitted,

/s/ Brooks A. Richardson

Brooks A. Richardson, OBA No. 18133

GABLEGOTWALS

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Attorneys for Telnyx, LLC

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2024, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants on the ECF System.

I hereby certify that on May 23, 2024, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing and served on the following via First-Class United States Mail:

Anthony Trupia
605 SE 21st St.
Oklahoma City, OK 73129

/s/ Brooks A. Richardson